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SDMS DocID 559843

January 8, 1990

Writer's Direct Dial
(617) 345-3290

Steven J. Calder
United States Environmental Protection Agency
P.O. Box 5988
JFK Station
Boston, Massachusetts 02114

Superfund Records Center
SITE: Coakley
BREAK: 11.9
OTHER: 559843

Re: North East Solvents Reclamation Corporation; Response to
Request for Information for the Coakley Landfill site in
Greenland and North Hampton, New Hampshire--

Dear Mr. Calder:

By letter dated December 18, 1989, the United States
Environmental Protection Agency forwarded to North East Solvents
Reclamation Corporation ("North East Solvents") a Request for
Information with respect to the Coakley Landfill Site. Enclosed
you will find North East Solvents' response to that Request for
Information.

Very truly yours,

Robin Renee Patrick
Robin Renee Patrick

cc: Lawrence M. Levinson, Esq.
David P. Rosenblatt, Esq.
Steven Weiner

**RESPONSE TO REQUEST FOR INFORMATION
FOR THE COAKLEY LANDFILL SUPERFUND SITE**

1. Identify the Respondent and each and every person answering these Questions on behalf of the Respondent.

The Respondent is North East Solvents Reclamation Corporation, 221 Sutton Street, North Andover, Massachusetts (hereinafter "North East Solvents"). The Person answering these questions on behalf of the Respondent is Steven Weiner, Director of Regional Operations, GSX/North East, 221 Sutton Street, North Andover, Massachusetts.

2. If the Respondent has or had more than one office, plant or facility in New England,
 - a. specify the location of each office, plant or facility;
 - b. describe the activities, including but not limited to all manufacturing processes, that occur or occurred at each location; and
 - c. provide the information and documents requested in each and every one of these Questions with respect to each such location.

North East Solvents's facility is located at 300 Canal Street, Lawrence, Massachusetts and its office is located at 221 Sutton Street, North Andover, Massachusetts. North East Solvents operates a transfer and storage facility at the Canal Street location.

3. If your company is or was a subsidiary of another corporation, or if your company has or had subsidiary corporations,
 - a. identify any and all such other corporations; and
 - b. for each and every such corporation state the dates during which the parent/subsidiary relationship existed.

North East Solvents is presently a subsidiary of GSX Chemical Services, Inc., Congaree Building, Suite 100, 121 Executive Center, P.O. Box 210799, Columbia, South Carolina 29210. North East Solvents became a subsidiary of GSX Chemical Services, Inc. on September 12, 1989.

4. Specify the EPA RCRA identification number of Respondent.

MAD000604447

5. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.

Steven Weiner, Director of Regional Operations, GSX/North East, 221 Sutton Street, North Andover, Massachusetts.

James Green, Facility Manager, GSX/North East, 221 Sutton Street, North Andover, Massachusetts.

Jean Soltys, Technical Manager, GSX/North East, 221 Sutton Street, North Andover, Massachusetts.

Robin Renee Patrick, Counsel to GSX/North East, Burns & Levinson, 50 Milk Street, Boston, Massachusetts 02109.

6. For each and every Question contained herein, identify all documents consulted, examined or referred to in the preparation of the answer and provide true and accurate copies of all such documents.

There are no such documents.

7. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

North East Solvents has no reason to believe that there may be persons able to provide a more detailed or complete response to any Question contained herein or who may be able to provide additional responsive documents.

8. For each and every all [sic] person, including Respondent's employees, agents, attorneys, contractors, and representatives, who you know, believe, or suspect have knowledge, information, or documents concerning the generation, use, purchase, treatment, storage, disposal or other handling of materials at, or transportation of materials to, the Coakley Site, or the ownership or operation of the Coakley Site,

a. identify the person; and

b. for each person identified describe the knowledge, information, or documents he or she has, is believed to have, or is suspected to have.

North East Solvents is not aware of any person who may have knowledge, information or documents concerning the generation, use, purchase, treatment, storage, disposal or other handling of materials at, or transportation of materials to, the Coakley Site, or the ownership or operation of the Coakley Site.

9. Produce all documents that in any way relate or pertain to, evidence, or have any bearing upon the ownership or operation of the Coakley Site at any time.

North East Solvents has no documents that in any way relate or pertain to, evidence, or have any bearing upon the ownership or operation of the Coakley Site at any time.

10. Produce all documents that in any way relate or pertain to, evidence, or have any bearing upon the use, treatment, storage, disposal, or other handling of materials at the Coakley Site.

North East Solvents has no documents that in any way relate or pertain to, evidence, or have any bearing upon the use, treatment, storage, disposal, or other handling of materials at the Coakley Site.

11. Produce all documents that in any way relate or pertain to, evidence, or have any bearing upon the transportation of materials to the Coakley Site.

North East Solvents has no documents that in any way relate or pertain to, evidence, or have any bearing upon the transportation of materials to the Coakley Site.

12. Produce all documents that in any way relate or pertain to, evidence, or have any bearing upon the generation, use, purchase, treatment, storage, disposal or other handling of materials that were transported directly or indirectly to the Coakley Site.

North East Solvents has no documents that in any way relate or pertain to, evidence, or have any bearing upon the generation, use, purchase, treatment, storage, disposal or other handling of materials that were transported directly or indirectly to the Coakley Site.

13. Produce all documents that in any way relate or pertain to, evidence, or have any bearing upon the identities of any and all persons who caused or contributed to the use, treatment, storage, disposal, or other handling of materials at the Coakley Site.

North East Solvents has no documents that in any way relate or pertain to, evidence, or have any bearing upon the identities of any persons who caused or contributed to the use, treatment, storage, disposal, or other handling of materials at the Coakley Site.

14. Produce all documents that in any way relate or pertain to, evidence, or have any bearing upon the identities of any and all persons who caused or contributed to the transportation of materials to the Coakley Site.

North East Solvents has no documents that in any way relate or pertain to, evidence, or have any bearing upon the identities of any persons who caused or contributed to the transportation of materials to the Coakley Site.

15. Produce all documents that in any way relate or pertain to, evidence, or have any bearing upon the identities of any and all persons who caused or contributed to the generation, use, purchase, treatment, storage, disposal, or other handling of materials that were transported directly or indirectly to the Coakley Site.

North East Solvents has no documents that in any way relate or pertain to, evidence, or have any bearing upon the identities of any persons who caused or contributed to the generation, use, purchase, treatment, storage, disposal, or other handling of materials that were transported directly or indirectly to the Coakley Site.

16. Produce all documents that in any way relate or pertain to, evidence, or have any bearing upon any and all arrangements between any persons for disposal, or transportation for disposal, of materials at or to the Coakley Site.

North East Solvents has no documents that in any way relate or pertain to, evidence, or have any bearing upon any arrangements between any persons for disposal, or transportation for disposal, of materials at or to the Coakley Site.

17. State whether any documents requested herein have been transferred voluntarily or involuntarily to others or have been otherwise disposed of. If the answer is "yes," identify each such document, identify the person to whom it was transferred, describe the circumstances surrounding such transfer or other disposition, and state the date or approximate date of such transfer or other disposition.

No documents requested herein have been transferred voluntarily or involuntarily to others or have been otherwise disposed of by North East Solvents.

18. For any and all materials (as defined above) that you disposed of, including any oil placed on the roads of the Coakley Site:
- a. describe the material in full detail;
 - b. state the common chemical name, specific chemical name, physical state and chemical composition of the material (specify all constituents and percent composition by volume or weight of each);
 - c. describe in detail the nature and quantity of the hazardous materials involved in each such arrangement;
 - d. produce Material Safety Data Sheets (MSDS), Chemical Abstracts Service Registry Numbers (CASRN), manufacturers' specifications and all analytical data regarding composition of such material;
 - e. specify the total volume, in gallons for liquids and tons for solids, of each material disposed of annually;
 - f. describe the specific process that generated the material (e.g., crankcase waste oil; mill machining; sewage plant sludge; municipal incinerator);
 - g. identify each and every person with whom you arranged or transacted for disposal, or transportation for disposal, of such material;
 - h. describe all tests, analyses, analytical results and manifests concerning each material contained in such materials;
 - i. state the dates of each arrangement or transaction;
 - j. specify the precise locations at which each hazardous material involved in such transactions actually was disposed of or treated;
 - k. identify each and every person who selected the location to which the materials were to be disposed or treated;
 - l. state the amount paid in connection with each such arrangement or transaction and the method of payment;

- m. describe the final disposition of each of the hazardous materials involved in each arrangement;
- n. specify all measures you took to determine how and where treatment or disposal of the hazardous materials involved in each arrangement would actually take place.;
- o. describe in full detail the markings on and type, condition and number of containers in which the materials were contained when they were stored, disposed, treated, or transported for disposal or treatment;
- p. provide all documents relating to each such arrangement or transaction, including but not limited to shipping papers, memoranda, vouchers, work orders, receipts, bills, and manifests;
- q. identify all participants and provide the substance of (and if written produce all documents relating to) any communications between any persons relating to such disposal or transportation of materials.

To the best of North East Solvents's knowledge and information, North East Solvents did not dispose of any materials, as defined in this Information Request, or oil at the Coakley Site. Accordingly, this Question is not applicable.

- 19. With respect to any and all persons, including you, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials at or to the Coakley Site (such persons will hereinafter be referred to as "Generators"):
 - a. identify each and every Generator;
 - b. identify each and every person with whom the Generators made such arrangements;
 - c. identify each and every person who accepted such materials for disposal or for transportation for disposal;
 - d. specify every date on which each Generator made such arrangements;
 - e. describe in detail the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all materials involved in such arrangement;

- f. describe in detail the nature and quantity of the hazardous materials involved in each such arrangement;
- g. identify the owner of the materials involved in each such arrangement;
- h. describe all tests, analyses, analytical results or manifests concerning each material involved in such transactions;
- i. specify the precise locations at which each material involved in such transactions actually was disposed or treated;
- j. identify each and every person who selected the location to which the materials were to be disposed or treated;
- k. identify each and every person who selected the Coakley Site as the location at which the materials were to be disposed or treated;
- l. state the amount paid in connection with each such arrangement, the method of payment, and the identity of the persons involved in each arrangement;
- m. specify where the persons identified in g. or h., above, intended to have the materials involved in each arrangement treated or disposed and all evidence of their intent;
- n. specify all intermediate sites to which the materials involved in each arrangement were transshipped, or at which they were stored or held, any time prior to final treatment or disposal;
- o. describe what was done to the materials once they were brought to the site of disposal;
- p. describe the final disposition of each of the materials involved in each arrangement;
- q. specify all measures taken by any and all Generators to determine how and where treatment or disposal of the materials involved in each arrangement would actually take place;
- r. describe in full detail the markings on and type, condition and number of containers in which the materials were contained when they were stored, disposed, treated, or transported for disposal or treatment;

s. identify all participants and provide the substance of (and if written produce all documents relating to) any communications between any persons relating to such disposal or transportation of materials.

To the best of North East Solvents's knowledge and information, North East Solvents did not arrange for disposal or treatment, or arrange for the transportation for disposal or treatment, of materials at or to the Coakley Site. In addition, North East Solvents is not aware of the identity of any other person who may have arranged for disposal or treatment, or arranged for the transportation for disposal or treatment, of materials at or to the Coakley Site. Accordingly, this Question is not applicable.

20. For any and all persons, including the Respondent, who may have accepted materials for transport to the Coakley Site (such persons will hereinafter be referred to as "Transporters"):
- a. identify each and every Transporter;
 - b. specify the quantity (by weight and/or volume) of all materials that each such Transporter accepted for transportation to the Coakley Site;
 - c. describe in detail the nature of the materials accepted by the Transporters including the chemical content, characteristics, and physical state (e.g., solid, liquid);
 - d. identify each and every person from whom the Transporters accepted materials;
 - e. specify every date on which the Transporters transported the materials to the Coakley Site;
 - f. describe all tests, analyses, analytical results and manifests concerning each material accepted for transportation to the Coakley Site;
 - g. specify the precise locations at the Coakley Site to which each material was transported;
 - h. identify each and every person who selected the location to which the Transporter would take the material;
 - i. identify each and every person who selected the Coakley Site as the location to which the Transporter would take such material;

j. specify the amount paid to each Transporter for accepting the materials for transportation, the method of payment, and the identity of the persons who paid each Transporter;

k. specify all sites at which such materials were transshipped through, or were stored or held at, prior to their final treatment or disposal at the Coakley Site;

l. specify what was done to the materials after they were transported to the Coakley Site;

m. describe all measures taken by you to determine what the Transporters would actually do with the materials they accepted for transportation;

n. describe the markings on, type and number of containers in which the materials were contained when they were accepted by the Transporters and when they were left at the Coakley Site;

o. identify all participants and provide the substance of (and if written produce all documents relating to) any communications between any persons relating to the transportation of materials to the Coakley Site.

To the best of North East Solvents's knowledge and information, North East Solvents did not accept materials, as defined in this Information Request, for transport to the Coakley Site. In addition, North East Solvents is not aware of the identity of any other person who may have accepted materials, as defined in this Information Request, for transport to the Coakley Site. Accordingly, this Question is not applicable.

21. Describe the acts or omissions of any persons other than your employees, agents, or those persons with whom you had a contractual relationship, which may have caused the release or threat of release of hazardous substances at the Coakley Site. In addition:

a. identify such persons;

b. identify any damages relating to or resulting from such act or omissions;

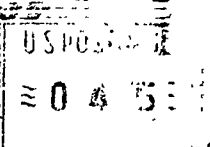
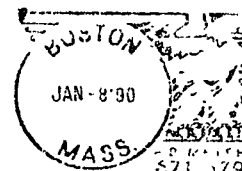
c. describe all precautions you took against foreseeable acts or omissions of such third parties. Include the consequences that could foreseeably result from such acts or omissions; and

d. describe the care you exercised with respect to the hazardous substances found at the Coakley Site.

To the best of North East Solvents's knowledge and information, North East Solvents did not dispose of any materials, as defined in this Information Request, at the Coakley Site nor did North East Solvents accept materials, as defined in this Information Request, for transport to the Coakley Site. In addition, to the best of North East Solvents's knowledge and information, North East Solvents did not arrange for disposal or treatment, or arrange for the transportation for disposal or treatment, of materials at or to the Coakley Site. Accordingly, this Question is not applicable.

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